

Message

From: Crawford, Dorothy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B22442C0DAD249C1B798271CB981B12F-CRAWFORD, DOROTHY]
Sent: 6/17/2019 11:54:59 AM
To: Salisbury, Dwayne N. [DSalisbury@cabq.gov]; dgates@cabq.gov
CC: Verhalen, Frances [verhalen.frances@epa.gov]
Subject: RE: Exceptional Event Demonstration, PM10 2018 South Valley 35-001-0029, four exceedances
Attachments: 19.06-14 - R6 Letter to COA RM10 2018 Exceedances -JRobinson sign.pdf

EPA response letter to May 23, 2019, Initial Notification. Thanks again for all your efforts.

Dorothy Crawford
U.S. EPA, Region 6, Air Monitoring
(214) 665-2771

From: Crawford, Dorothy
Sent: Wednesday, June 05, 2019 1:11 PM
To: Salisbury, Dwayne N. <DSalisbury@cabq.gov>; dgates@cabq.gov
Cc: Verhalen, Frances <verhalen.frances@epa.gov>
Subject: RE: Exceptional Event Demonstration, PM10 2018 South Valley 35-001-0029, four exceedances

Thanks for talking today. Fran will be sending the response to your 5/23/19 letter. Some notes from today's call:

- The city has entered 'rj' (request for exclusion, High Wind) flags into AQS for each hour on the days of the four exceedances.
- City's research indicates winds during the exceedances exceeded the regulatory High Wind Threshold of 25 mph.
- It appears the four 2018 PM10 exceedances fit into the Tier 2 analyses category for areas without SIP/TIP/FIP since Bernalillo County has not been designated as non-attainment.
- We agreed to a target date for the demonstrations submittal.
- The city plans on a 30 day public notice of demonstrations prior to submittal.
- The city hopes to provide us with pre-public notice draft documents for review.
- Since the city's last Demonstration preparation and submittal in 2018, EPA has issued national guidance for High Wind events (*Guidance on the Preparation of Demonstrations in Support of Requests to Exclude Ambient Air quality Data Influenced by High Wind Dust Events Under the 2016 Exceptional Events Rule*).
- Suggest the city review the April 2019 High Wind guidance for various recommended Tier 2 analyses and 'conclusion statements' for the various Exceptional Event regulatory criteria.

Below is my understanding of the recommended topics in an Exceptional Event Demonstration for Tier 2 non-SIP/TIP/FIP areas, based on 2019 High Wind guidance:

Conceptual Model

Clear Causal

Clear Causal Analyses (see Table 3)

Historical Concentrations Comparison Analyses (see Table 4)

Conclusion statement

Not Reasonably Controllable and Preventable

Basic Sources and Controls Analyses (see Table 1)

Reasonableness of Controls Analyses (see Table 2)

Implementation/enforcement of Controls

Conclusion statement

Natural Event

Conclusion statement

Public Notice

Address and provide copy of any comments, and conclusion statement

The subject Tables in the 2019 High Wind guidance provides *examples* of elements or factors for the analyses. Analyses and level of supporting documentation for any demonstration will vary on a case-by-case basis.

Dorothy Crawford
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From: Crawford, Dorothy
Sent: Tuesday, June 04, 2019 11:06 AM
To: Salisbury, Dwayne N. <DSalisbury@cabq.gov>; d gates@cabq.gov
Cc: Verhalen, Frances <verhalen.frances@epa.gov>
Subject: Exceptional Event Demonstration, PM10 2018 South Valley 35-001-0029, four exceedances

Dwayne and Dan, We would like to talk with you about the Initial Notification letter dated 5/23/19. Primary topic for the call will be timeline for Exceptional Event Demonstration public notice and submittal. We need to talk before we respond to the letter with submittal due date.

Could you make a conference call at any of the following times?

- Wed 6/5 at 10 am Dallas/9 am Albuquerque;
- Wed 6/5 at 11 am Dallas/10 am Albuquerque;
- Wed 6/5 at 3 pm Dallas/2 pm Albuquerque;
- Thurs 6/6 at 10 am Dallas/9 am Albuquerque;
- Thurs 6/6 at 11 am Dallas/10 am Albuquerque;
- Thurs 6/6 at 2 pm Dallas/1 pm Albuquerque;
- Fri 6/7 at 11 am Dallas/10 am Albuquerque;
- Fri 6/7 at 2 pm Dallas/1 pm Albuquerque;

Let us know and I will send an outlook scheduler and call in number. Thank you.

Dorothy Crawford
U.S. EPA, Region 6, Air Monitoring
(214) 665-2771